

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.,

Plaintiff,

V.

C.A. No. 04-10353-PBS

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR,

Defendants.

## **DEFENDANTS' ASSENTED-TO MOTION FOR IMPOUNDMENT**

Defendants Voice Signal Technologies, Inc., Laurence S. Gillick, Robert S. Roth, Jonathan P. Yamron, and Manfred G. Grabherr move pursuant to Local Rule 7.2 and section 14 of the parties' agreed-to Protective Order for an order impounding Exhibit A to the Declaration of Paul E. Bonanno, which is being filed concurrently by hand.

As grounds for this motion, defendants state that Exhibit A to the Declaration of Paul E. Bonanno has been designated by ScanSoft as containing highly confidential information pursuant to the parties' Protective Order. Pursuant to section 14 of the parties' Protective Order, which was entered by the Court on March 11, 2005, any documents filed with the Court that disclose highly confidential information, as defined by the Protective Order, must be filed under seal.

WHEREFORE, defendants request that the Court enter an order impounding Exhibit A to the Declaration of Paul E. Bonanno. Defendants further request that the Court grant it leave, pursuant to Local Rule 7.2(d), to file Exhibit A to the Declaration of Paul E. Bonanno under seal concurrently with this motion for impoundment.

Respectfully submitted,

LAURENCE S. GILLICK, ROBERT S. ROTH,  
JONATHAN P. YAMRON, MANFRED G.  
GRABHERR and VOICE SIGNAL  
TECHNOLOGIES, INC.

By their attorneys,

/s/ Paul E. Bonanno

Robert S. Frank, Jr. (BBO No. 177240)  
Sarah Chapin Columbia (BBO No. 550155)  
Paul D. Popeo (BBO No. 567727)  
Paul E. Bonanno (BBO No. 646838)  
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Dated: June 9, 2005

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that counsel for defendants conferred with counsel for ScanSoft on June 9, 2005 in an effort to resolve the issues presented in this motion and that counsel for ScanSoft assented to this motion.

/s/ Paul E. Bonanno